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Attorneys for Plaintiff and the Putative Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LYNN HALL, individually and on behalf of
others similarly situated,

Plaintiff,

vs.

COMCAST CORPORATION, COMCAST
OF CALIFORNIA / COLORADO / TEXAS /
WASHINGTON, INC., COMCAST OF
CALIFORNIA / COLORADO /
WASHINGTON I, INC. and DOES 1 to 50

Defendants.

Case No.: 3:11-cv-05174-JSW

**STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING EXTENSION OF DEADLINE
TO FILE MOTION FOR CLASS
CERTIFICATION**

CLASS ACTION

STIPULATION

WHEREAS on July 30, 2012, the Court entered the Parties' Stipulation and Order Regarding Extension of Deadlines (Dkt. No. 26). Pursuant to this Stipulation and Order, Plaintiff's motion for class certification must be filed by January 18, 2013, Defendants' opposition to that motion must be filed by February 22, 2013, and Plaintiff's reply brief must be filed by March 8, 2012. The motion for class certification is currently set for hearing on April 12, 2013 at 9:00 AM.

WHEREAS the Parties are currently working to resolve a number of discovery disputes, including disputes regarding, *inter alia*: scheduling the depositions of certain witnesses; the propriety of objections and responses to discovery requests; and whether each Defendant employed Plaintiff during the class period. Regarding deposition scheduling, the Parties are currently attempting to schedule the depositions of Marcus Tolibas, Douglas Berrios, Brian Key, Michael Prothrow, Ray Rosas, and two Rule 30(b)(6) witnesses.¹ Defendants also anticipate continuing the deposition of Plaintiff Lynn Hall. The Parties hope to schedule these depositions sometime in December 2012 and January 2013. The Parties may also subpoena additional witnesses for deposition. In addition, the Parties are attempting to resolve their disputes over the propriety of objections and responses to discovery requests, including a dispute over the sufficiency of document production.

WHEREAS the Parties hope to resolve these disputes without Court involvement, but recognize that such resolution will require an extension of the current deadline for Plaintiff to file a motion for class certification. Such an extension is warranted to allow the Parties time to complete all necessary discovery. An extension is also necessary to ensure that the Parties have sufficient time to determine the evidence obtained through discovery which supports or opposes class treatment.

AND WHEREFORE, in light of the foregoing, the Parties agree to the following briefing schedule:

Plaintiff will file her motion for class certification by February 22, 2013;

Defendants will file their opposition to Plaintiff's motion for class certification by March 29, 2013; and

¹ The Parties have already scheduled the depositions for the following witnesses: Pamela Gonzalez (November 27, 2012); Stephen Gee (November 29, 2012); Sean Reid (December 6, 2012), and Joseph Novotny (December 17, 2012).

1 Plaintiff will file her reply brief by April 16, 2013.

2 A hearing on Plaintiff's motion for class certification should be set for May 17, 2013, or a date
3 convenient to the Court's calendar.

4 IT IS SO STIPULATED.

5 DATED: November 21, 2012

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7 /s/ Lee B. Szor

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15 Attorneys for Plaintiff LYNN HALL and the Putative Class

17 DATED: November 21, 2012

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18 /s/ Gary T. Lafayette

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23 Attorneys for Defendants COMCAST CORPORATION and
24 COMCAST OF CALIFORNIA / COLORADO /
25 WASHINGTON I, INC.

ORDER

The Court, having reviewed the Parties' Stipulation Regarding Extension of Deadline to File Motion for Class Certification, and good cause appearing, hereby vacates the existing briefing deadlines and adopts the deadlines provided above. The hearing on Plaintiff's Motion for Class Certification shall be set for May 17, 2013. The Court FURTHER ORDERS that the further case management conference is continued to June 14, 2012 at 1:30 p.m.

IT IS SO ORDERED.

Dated: December 3, 2012



THE HONORABLE JEFFREY S. WHITE
United States District Court